

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,

Plaintiff,

v.

TEXAS COUNTY, MISSOURI,  
MICHAEL R. ANDERSON,  
TEXAS COUNTY PROSECUTING  
ATTORNEY, and  
MICHAEL R. ANDERSON, individually,  
Defendants.

Case No.: 09-3018-CV-S-RED

**NOTICE OF DEPOSITION**

NOTICE IS HEREBY GIVEN that the attorneys for Defendant Michael Anderson, will take the deposition of Dr. Dale Halfaker to be used in the above-entitled cause, as hereinafter set forth:

**PLACE**

Said deposition will be taken at the offices of Dr. Dale Halfaker, 4350 S. National Ave., Suite B116, Springfield, MO 65810.

**TIME**

The deposition will begin at 1:00 p.m., Monday, October 11, 2010, and continue until 5:00 p.m. on that day, and commencing at 9:00 a.m. and continuing until 5:00 p.m. on each day thereafter until completed.

**PARTY TO BE DEPOSED**

DR. DALE HALFAKER

### **PURPOSE OF DEPOSITION**

All matters which are relevant to the discovery and/or subject of the above-entitled cause of action.

### **COURT REPORTER**

The deposition will be reported by Alpha Reporting Service, 3230-G S. National, Springfield, MO 65807.

### **DOCUMENTS TO BE PRODUCED**

1. A complete copy of all files in possession of Dr. Dale Halfaker, including any correspondence, notes, billing statements, statements and reports, relating to his medical treatment of Monica Daniel Hutchison.
2. All documents, statements, depositions, correspondence, electronic mail, computer databases, computer file, microfisch, microfilm, CD ROMS, or other documents produced to you by David Steelman, Stephen Gaunt, or any agent or employee of the Steelman, Gaunt & Horsefield law firm, Monica Daniel Hutchison, or any treating physician of Monica Daniel Hutchison.
3. All data or other information considered by you in forming your opinions in this case.
4. Any exhibits to be used as a summary of or support of your opinions in this case.
5. All of the materials on which you intend to rely in reaching and/or expressing opinion of any kind in this case.

6. Any text, treatise, or professional journal which you have consulted or relied upon in determining or expressing an opinion of any kind in this case.

7. All materials you consulted, reviewed or inspected in connection with your work in this case, whether or not such materials were used or relied upon in forming your opinions in this case.

8. All materials and documents not previously described in your possession, custody or control which you claim support any opinion that you intend to express in this case.

9. All billing records or other documentation that evidence your charges for work done in this case.

10. A copy of your current curriculum vitae.

11. A list of publications authored by you during the previous ten year period.

12. A list of all cases in which you have given testimony by way of deposition or at trial in the previous four years.

**TAYLOR, STAFFORD, CLITHERO,  
FITZGERALD & HARRIS, LLP**

/s/Warren E. Harris

By \_\_\_\_\_

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**COUNSEL FOR DEFENDANT  
ANDERSON**

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 28<sup>th</sup> day of September 2010 the foregoing *Notice of Deposition* was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel for Plaintiff, David L. Steelman and counsel for Defendant Texas County, Corey L. Franklin.

/s/ Warren E. Harris

Warren E. Harris